

**UNITED STATES DISTRICT COURT**  
**FOR DISTRICT OF OREGON**  
**PORTLAND DIVISION**

JENNIFER RAE GUNTER, individually and  
as a natural parent of A.G.; ROBERT JAY  
SCHWARTZ, individually and as a natural parent  
of J.S.; HOLLY LYNN GOVE, individually  
and as a natural parent of M.G.; CHELSEA  
ELIZABETH PERRITT, individually and as a  
natural parent of L.P.

Plaintiff(s),

v.

Case No.: 3:21-cv-01661-YY

NORTH WASCO COUNTY SCHOOL  
DISTRICT BOARD OF EDUCATION;  
CAROLYN BERNAL, in her individual  
capacity and in her official capacity as  
Superintendent of the North Wasco County  
Public School District; and REBECCA  
THISTLETHWAITE, DAWN RASMUSSEN,  
DAVID JONES, JOHN NELSON, BRIAN  
STEVENS, JOSE APARICIO, JUDY  
RICHARDSON, all in their individual capacities  
and in their capacities as members of the North  
Wasco County School District Board of  
Education,

Defendant(s).

**MOTION FOR EXTENSION OF TIME TO**  
**AMEND VERIFIED COMPLAINT FOR DECLARATORY JUDGEMENT**

Plaintiffs move this court for an extension of time of 24 days from January 21, 2022, to and including February 14, 2022, to serve and file the Amended Verified Complaint for Declaratory Judgement. The (Amended Verified Complaint for Declaratory Judgement is due on January 21, MOET TO AMEND COMPLAINT

2022; this is the 1<sup>st</sup> extension for a total of 54 days. The reason for the request is extended time to seek and retain possible council for plaintiffs and or minors, as 30-day time frame order was submitted 3 days prior to the Christmas Holiday, most law offices were closed or on vacation through the New Year seeking representation has been challenging, as well as firms are overflowing with current Oregon caseloads. Furthermore, extension of time to amend complaint and adjust parties. Counsel was notified on 1/20/22, and again on 1/24 of motion of extension, defense responded 1/20/22 and on 1/24/22. Defense council stated disapproval of motion for extension. I certify that, upon the confirmation email stating that the document has been accepted by the eFiling system, this Motion will be eServed pursuant to ORAP 16.45 on Mr. Brett Mersereau.

Respectfully submitted this \_\_\_\_\_ January 25, 2022 \_\_\_\_\_.

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